

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PATRICK L. MCGUINNESS,

Plaintiff,

v.

TXU ENERGY SOLUTIONS LP and  
SCOTT HARRISON,

Defendants.

Civil Action No. 04 CV 11170 JLT

FILED FEE PAID:

RECEIVED #

AMOUNT \$

CLERK

DATE

50348  
30.00  
7/27/04

MOTION FOR ADMISSION PRO HAC VICE  
OF PAUL W. BOWEN

In accordance with Local Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, Gregory A. Manousos, an attorney admitted to practice before this Court, hereby moves that this Honorable Court admit *pro hac vice* Attorney Paul W. Bowen, for the purpose of serving as co-counsel in the above-captioned case. In support of this motion, the undersigned attorney submits herewith the Affidavit of Paul W. Bowen, and states that he will act as co-counsel of record in this matter.

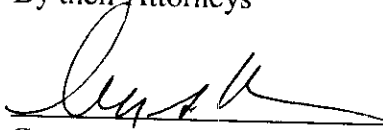
Gregory A. Manousos, an attorney with the firm Morgan, Brown & Joy, LLP, One Boston Place, Boston, MA 02108, (617) 523-6666 and a member of the bar of this Court, supports this application and shall also appear on behalf of the Defendants. Mr. Manousos and his firm will receive service of pleadings, documents and communications from Plaintiff's counsel and the Court on behalf of the Defendants.

A proposed Order is attached hereto.

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court admit *pro hac vice* Attorney Paul W. Bowen, for purpose of the above-captioned litigation.

Respectfully Submitted,

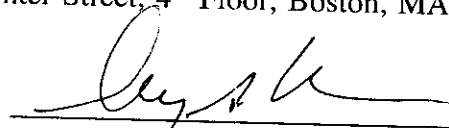
TXU ENERGY SOLUTIONS COMPANY,  
LP AND SCOTT HARRISON  
By their Attorneys

  
\_\_\_\_\_  
Gregory A. Manousos, BBO # 631455  
Morgan, Brown & Joy, LLP  
One Boston Place  
Boston, MA 02108  
(617) 523-6666

Dated: July 23, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served upon attorney for plaintiff, Paul A. Manoff, Attorney at Law, 47 Winter Street, 4<sup>th</sup> Floor, Boston, MA 02108, by first class mail, on this 23 day of July, 2004.

  
\_\_\_\_\_  
Gregory A. Manousos